

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

IGOR RAYSKIN,

Plaintiff,

-against-

CITY OF NEW YORK; NEW YORK CITY  
POLICE DEPARTMENT; NEW YORK CITY  
DEPARTMENT OF CITYWIDE ADMINISTRATIVE  
SERVICES; NEW YORK CITY CIVIL SERVICE  
COMMISSION

Defendants.

Docket No.

16CV2311

COMPLAINT

JURY TRIAL REQUESTED

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S.D. OF N.Y.

Plaintiff respectfully alleges that:

1. This action arises under 28 U.S.C. §1331 et.seq.
2. The venue properly lies in the Southern District of New York because, among other things, that is where the main events underlying the claim took place.
3. In May of 2001, I was hired as a Traffic Enforcement Agent at NYPD.
4. I was on a probationary status for one year. After one year, my status was converted to permanent.
5. My annual evaluation forms contained a section classifying the status of the employee and my forms reflected my probationary status for one year and my permanent status for each year thereafter.
6. I was very proud of my work for NYPD; I gave it my all and I received very positive formal evaluations and informal feedback from my supervisors.
7. Being a Russian immigrant who spent most of his life in public service in Russia (as a Deputy Commissioner and Chief of Procurement for Smolensk Region Historic

Preservation Authority), my work at NYPD was exceptionally meaningful to me, because it allowed me to serve the people of the City of New York -- my new home in America.

8. In April of 2010, I was terminated from my job as a Traffic Enforcement Agent at NYPD.
9. The reason given for my termination was that I was supposedly a provisional employee who could be terminated at any time.
10. My attempts to go through the administrative process to challenge my termination involving my Union representative were fruitless.
11. I was also told that I was being terminated as a one of many provisionals who were being eliminated due to some sort of change in policy/and or law.
12. The effect of my termination was devastating on my life. Having lost the opportunity to serve the people of New York City that I cherished every day, I lost the ability to sleep through the night, my appetite suffered, and a number of health problems, (heart muscle enlargement, stress-related hearing loss, and a worsening of my diabetes) soon arose that were not present when I was working.
13. I was very depressed for more than five years, and it is only recently, that I have begun to climb out of this terrible state.
14. Even if the City's assertion that I was provisional were credited, despite the fact that my evaluation forms stated that I was permanent for each year except my first one, it appears obvious that the actions of the City of New York in terminating provisional employees were contrary to the U.S. Constitution.

15. When a person is terminated for the sole reason that he is provisional, especially while the City of New York itself violated the New York State Constitution that prohibits the employment of provisionals for more than a few months, the injustice here appears exceedingly clear and the City's action in terminating provisional employees would appear arbitrary and shocking to any sensible person.
16. Moreover, as a beneficiary of the Contract between my Union and the City of New York, I am entitled to be dealt with fairly and in good faith. It is obvious that this did not happen here.

WHEREFORE, Plaintiff requests relief as follows:

1. An order requiring the Defendants to pay Plaintiff the salary he would have earned from the day of termination through present day;
2. Damages for wrongful termination;
3. Damages for injuries to his health as a result of his termination; AND
4. An order imposing such other penalties on the defendants and granting remedies to the Plaintiff as the Court deems just and proper.

Dated: Brooklyn, NY

March 28, 2016

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Igor Rayskin', is written over a horizontal line.

Igor Rayskin, Pro Se

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